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16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 VANGUARD DEALER SERVICES, LLC
19 and MOTOR DEALER SERVICES GROUP,
20 LLC,

21 v.
22 Plaintiffs,

23 JORGE CERVANTES, CEC INDUSTRIES,
24 INC. d/b/a DEALERS DIRECT SYSTEMS
25 and/or DEALERS DIRECT
26 CONSULTANTS,

27 Defendants.

28 JORGE CERVANTES, CEC INDUSTRIES
29 INC. d/b/a DEALERS DIRECT SYSTEMS
30 and/or DEALERS DIRECT
31 CONSULTANTS,

32 Counterclaimants,

33 v.

34 VANGUARD DEALER SERVICES, LLC
35 and MOTOR DEALER SERVICES GROUP,
36 LLC,

37 Counter-Defendants.

38 Case No. 2:21-cv-01121-JAD-EJY

39 **STIPULATION AND ORDER TO
40 EXTEND THE DEADLINE FOR
41 DEFENDANTS TO FILE A RESPONSE
42 TO PLAINTIFFS' MOTION TO
43 DISMISS COUNTERCLAIM AND
44 MOTION TO STRIKE AFFIRMATIVE
45 DEFENSES**

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1 Plaintiffs/Counter-Defendants Vanguard Dealer Services, LLC and Motor Dealer
2 Services Group, LLC (together, "Plaintiffs") and Defendants/Counterclaimants Jorge Cervantes
3 and CEC Industries, Inc. (together, "Defendants") (collectively, the "Parties"), by and through
4 their undersigned counsel of record, hereby stipulate and agree to the following:

5 1. On August 29, 2022, Defendants filed an Answer to Plaintiffs' Second Amended
6 Complaint and Counterclaim (the "Counterclaim"). (ECF No. 59.)

7 2. On October 6, 2022, Plaintiffs filed a Motion to Dismiss the Counterclaim and a
8 Motion to Strike Affirmative Defenses (the "Motion to Dismiss and Strike").¹ (ECF Nos. 62-63.)

9 3. The deadline for Defendants' Response to Plaintiffs' Motion to Dismiss and Strike
10 is currently Thursday, October 20, 2022.

11 4. Counsel for Defendants are in the process of conferring with their client regarding
12 their Response to Plaintiffs' Motion to Dismiss and Strike. As such, the Parties hereby stipulate
13 and agree that the deadline for Defendants' Response shall be extended by two (2) weeks, up to
14 and including Thursday, November 3, 2022.

15 DATED this 18th day of October, 2022.

16 SEMENZA KIRCHER RICKARD

17 /s/ Katie L. Cannata

18 Lawrence J. Semenza, III, Esq., Bar No. 7174
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25 *Jorge Cervantes and CEC Industries, Inc.*

26 **IT IS SO ORDERED.**

27 Dated this 20th day of October, 2022.

28 
United States District Judge

¹ Plaintiffs were provided with a two-week extension to file a responsive pleading to Defendants' Counterclaim.